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4 **UNITED STATES DISTRICT COURT**  
5 **NORTHERN DISTRICT OF CALIFORNIA**  
6 **OAKLAND DIVISION**

7  
8 IN RE CALIFORNIA BAIL BOND  
9 ANTITRUST LITIGATION

10 THIS DOCUMENT RELATES TO:  
11 ALL ACTIONS  
12  
13  
14

Master Docket No. 19-cv-00717-JST-DMR

CLASS ACTION

**DECLARATION OF ADAM GITLIN IN  
SUPPORT OF ADMINISTRATIVE  
MOTION TO SUPPLEMENT THE  
AUGUST 12, 2021 LETTER BRIEF AND  
TO SEAL MATERIAL DESIGNATED  
AS CONFIDENTIAL BY AN OPPOSING  
PARTY**

1 I, Adam Gitlin, declare as follows:

2 1. I am a partner at the law firm of Lieff Cabraser Heimann & Bernstein, LLP, which  
3 has been appointed Interim Class Counsel. I have personal knowledge of the facts herein and, if  
4 called upon to testify to those facts, I could and would do so competently.

5 2. I submit this declaration, as required by Civil Local Rule 79-5, regarding  
6 Plaintiffs' Administrative Motion to Supplement the August 12, 2021 Letter Brief and to Seal  
7 Material Designated as Confidential by an Opposing Party. Plaintiffs bring this motion because  
8 Civil Local Rule 79-5(e) requires that information subject to an opposing party's confidentiality  
9 designation be filed provisionally under seal.

10 3. Filed with the motion is a true and correct copy of the redacted version of the  
11 following document, in which portions on the following pages reflect, restate, or discuss material  
12 that the American Contractors Indemnity Company ("ACIC") has designated "Confidential"  
13 under the Protective Order in this action (ECF No. 147) and that ACIC directed Plaintiffs to file  
14 under seal:

15 **ACIC\_000011890**

16 4. No stipulation as to the filing of this document could be obtained because  
17 Defendants, via email on September 29, opposed "any attempt to submit the document in  
18 question."

19 5. I declare under penalty of perjury under the laws of the United States that the  
20 foregoing is true and correct.

21 Executed on September 29, 2021 in Oakland, California.

22 /s/ Adam Gitlin  
23 Adam Gitlin  
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